

Ryan J. Villa
5501 Eagle Rock Ave NE, Ste C2
Albuquerque, NM 87113
(505) 639-5709
ryan@rjvlawfirm.com

Andrea Lee Luem, PHV
400 South Fourth Street, Ste 500
Las Vegas, NV 89101
(702) 575-0481
andrea@luemlaw.com

Attorneys for Defendant,
KENNETH JOHNSON

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

KENNETH JOHNSON,

Defendant.

Criminal case No. 20-CR-238-JLT-SKO

**DEFENDANT KENNETH JOHNSON'S
STATEMENT OF READINESS FOR
TRIAL**

Defendant Mr. Kenneth Johnson, by counsel, The Law Office of Ryan J. Villa, by Ryan J. Villa, and Andrea Lee Luem, provides his statement of readiness per the Court's Minute Order. *See* Order [Doc. 1419]. Mr. Johnson is prepared and ready to proceed to trial on January 14, 2025. Mr. Johnson asserts his speedy trial rights pursuant to the Sixth Amendment and demands a speedy trial. Mr. Johnson's right to a speedy trial will be violated if the January 14 trial date is continued.

The government's misconduct in disregarding court orders and discovery deadlines and intentionally dumping on defendants hundreds of thousands of items of new discovery on the eve of trial, warrants prohibition of certain evidence and witnesses. It does not warrant a continuance

1 of the January 14 trial. Nor should Mr. Johnson's right to a speedy trial be violated because of the
2 government's disregard for the Court's orders, the rules of discovery and the Due Process
3 Protections Act. Regardless of the government's misconduct, Mr. Johnson will be ready and
4 prepared for trial on January 14, 2025.

5 Respectfully submitted,

6 /s/ Ryan J. Villa

7 Ryan J. Villa
8 5501 Eagle Rock Ave NE, Suite C2
9 Albuquerque, NM 87113
10 (505) 639-5709
11 ryan@rjvlawfirm.com

12 /s/ Andrea Lee Luem

13 Andrea Lee Luem , PHV
14 400 South Fourth Street, Ste 500
15 Las Vegas, NV 89101
16 (702) 575-0481
17 andrea@luemlaw.com

18 **CERTIFICATE OF SERVICE**

19 I hereby certify that on this 22nd day of November, 2024, I served a true and correct copy
20 of the foregoing via ECF to:

21 All counsel of record

22 /s/ Ryan J. Villa
23 Ryan J. Villa
24
25
26
27